

1 contacting Everett. You know, this whole
2 thing involved those two.

3 Well, he was the one that just
4 happened to come and take photographs of me.
5 We're in a -- the day the photograph was
6 happening, I was still --

7 Q. You're talking about this is the
8 second occasion where they took photographs?

9 A. This is the first occasion. I'm
10 just laying down these different scenarios
11 to you as you ask them. You see what I'm
12 saying?

13 Now, I'm just explaining, you know,
14 why I'm suing Mr. Werby, over what incident.
15 And I had been complaining to internal
16 affairs, Mr. Everett and Werby, about Rogers
17 and Woolard. Those two mainly are really --
18 you know, they're big dudes. They ain't
19 small, and, you know, they ain't afraid to
20 put their hands on you. And Clark -- this
21 kind of thing. I had been complaining about
22 these guys before the incident had ever
23 taken place.

24 So now they're taking pictures of
25 what's going on. And this dude tried to --

1 now, this dude -- its result had been
2 covering up these injuries that I had
3 sustained. Because we're in an office
4 pretty much exactly like this down in the
5 medical section, me, Werby and Captain
6 Taylor. My people had contacted these
7 people and basically forced them to do it,
8 because they weren't going to do it
9 otherwise. And they had brought me down to
10 medical, put me in this little office. It
11 wasn't a small office. It was a little
12 bigger than this here. These lights --
13 about two, if not three, of these same exact
14 lights or, you know, double barrel lights
15 like that.

16 This dude turned off the lights and
17 told me, now, we got a window. It faces the
18 west side. This wall faces the west side.
19 And the light was coming straight in through
20 the window about a little bigger than this
21 right here. And it's got grate on here, so
22 it's crossed like this here when it hits the
23 wall about right here. Okay. Now, we were
24 standing over here, in this area over here.
25 They had moved the desk a little smaller

1 than this out the way, and the light was
2 coming in, like, you know, straight through
3 the window. He had me standing directly
4 into this light.

5 I said, well, why can't, you know,
6 we stand elsewhere, where, you know, the
7 light was adequate. He said, you're going
8 to do it this way, or you ain't going to
9 take no pictures at all. He was telling me
10 about the inconvenience of having to come
11 down and take pictures of me in the first
12 place. So, he wasn't going to put up with
13 what an inmate had to say, this and that and
14 blah, blah, blah.

15 Well, I had bruises on the back
16 side. I had abrasions all on my forehead
17 here from a ring and, you know, other stuff
18 that was wrong with me as far as being
19 swelled and that big knot on the back of my
20 head. Every time that this dude would take
21 a picture of me, I would have to stand
22 directly in this light, which, you know,
23 this had been a couple of days after the
24 incident, so I was becoming to be a little
25 better, anyway. And it was like a real

1 orangish-yellow light. And I would have to
2 stand, you know, over here. I was telling
3 him that it was messing the thing up, and he
4 was trying to sit here and tell me, no, it
5 was making it better.

6 Well, I had to sit here, you know,
7 in a specific way, you know, like I was
8 posing for him. And he wouldn't take a
9 picture until it was perfect. The abrasions
10 on my head, got the light coming in straight
11 through my window, telling me to look
12 straight, you know, don't squint, this kind
13 of thing, and he would take a picture then.

14 And I told him what about -- I had
15 about as much hair as I have on my head now.
16 And on the back of my head -- I used to have
17 long hair, you know, on the top, but I would
18 shave around the sides here. And I told him
19 I wanted a picture taken of the back of my
20 head right here. He said, no, there's too
21 much hair on your head. We ain't going to
22 be able to get that. And that was the end
23 of that. I went back to my cell. They did
24 whatever they did, and that was the end of
25 that.

1 The second situation is their
2 shooting me. Now, when I had been shot,
3 they came 30 minutes later, and they -- I
4 was up against my cell right there. And
5 they had took pictures of all my stuff. And
6 those two incidences are what I'm suing
7 Everett and Werby over, which is the
8 internal affairs office.

9 Q. Okay. What else?

10 A. Obviously, throughout all these
11 situations, at one point or another --
12 obviously, this is not a uniform thing going
13 on here, so it's not like we're catching it
14 exactly as it comes along.

15 Well, I'll show you. There's an
16 example of what -- well, I got a better
17 picture over there, but this is, you know,
18 about what a gunshot of the type that I
19 received looks like. This is a smaller --
20 obviously, this dude had been shot from a
21 distance. Now, this is a guy in New York
22 over a protest when the police had shot him,
23 so this is all coming off the internet.
24 Right here, on his back side. I had been
25 shot on my leg.

1 Now, the bruise I ended up getting,
2 now, I had -- it had tore off all the skin.
3 It knotted me down a good little bit, so
4 there was an actual hole in my leg. And the
5 bruise was, you know, the whole size of my
6 leg like that. And I had to stay in my
7 cell, you know, after they had seen -- after
8 that first day, they had come and gave me
9 regular bandages and ointment and stuff that
10 I can, you know, redo my bandages on me and
11 that kind of thing.

12 Q. Okay. Let's move on to what other
13 complaints you have got, other than we have
14 talked about.

15 A. That was the thing. Oh, yeah, these
16 guys over here. You mind if I go use the
17 bathroom real quick?

18 MR. LONG:

19 No, go ahead.

20 (Off the record.)

21 MR. LONG:

22 Q. Okay. We were going to -- let me
23 know if there is any other items that are
24 contained in your complaint that you have
25 not addressed.